

REDACTED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

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Plaintiff,

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V.

Criminal Action No. 06- 82

DUVILLE T. GOULD,

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Defendant.

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INDICTMENT

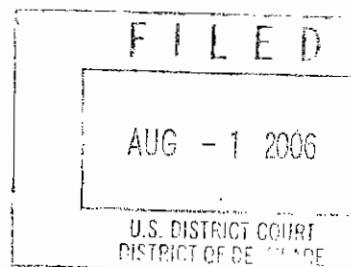
The Federal Grand Jury for the District of Delaware charges that:

Count I

On or about July 14, 2006, in Wellington Woods, in or near Newark, in the District of Delaware, Duville T. Gould, defendant herein, did knowingly possess in a closet in a residence, with intent to distribute, more than 50 grams of a substance containing a detectable amount of cocaine base, a/k/a "crack," a schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

Count II

On or about July 14, 2006, in Wellington Woods, in or near Newark, in the District of Delaware, Duville T. Gould, defendant herein, did knowingly possess in a closet in a residence, with intent to distribute, more than 5 grams of a substance containing a detectable amount of cocaine base, a/k/a "crack," a schedule II narcotic controlled substance, in violation of Title 21, United States Code Section 841(a)(1) and (b)(1)(B).



Count III

On or about July 14, 2006, in Wellington Woods, in or near Newark, in the District of Delaware, Duville T. Gould, defendant herein, did knowingly possess on his person, with intent to distribute, more than 5 grams of a substance containing a detectable amount of cocaine base, a/k/a "crack," a schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

Count IV

On or about July 14, 2006, in Wellington Woods, in or near Newark, in the State and District of Delaware, Duville T. Gould, defendant herein, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, possession with intent to distribute more than five grams of cocaine base, a/k/a crack cocaine, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B), did knowingly possess a firearm, to wit, three handguns described as a Glock model 19 9 mm semi-automatic, serial no. GYG84, a Glock model 30 .45 caliber semi-automatic, serial no. 6FC795, and a Taurus model PT 58 S .380 caliber semi-automatic, serial no. KHH0910V, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

Count V

On or about July 14, 2006, in Wellington Woods, in or near Newark, in the State and District of Delaware, Duville Gould, defendant herein, did knowingly possess in and affecting interstate commerce, a firearm, that is, three handguns described as a Glock model 19 9 mm semi-automatic, serial no. GYG84, a Glock model 30 .45 caliber semi-automatic, serial no. 6FC795, and a Taurus model PT 58 S .380 caliber semi-automatic, serial no. KHH0910V, after having been convicted on or about May 18, 2001, of a crime punishable by imprisonment for a term exceeding one year, in the

Cecil County Circuit Court for the State of Maryland, in violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

Upon conviction of one or more of the controlled substance offenses alleged in Counts I and II of this Indictment, defendant shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

- (a) Approximately \$3,000 in United States Currency;
- (b) Approximately \$9,000 in United States Currency
- (c) a Glock model 19 9 mm semi-automatic, serial no. GYG84;
- (d) a Glock model 30 .45 caliber semi-automatic, serial no. 6FC795; and
- (e) a Taurus model PT 58 S .380 caliber semi-automatic, serial no. KHH0910V.

Upon conviction of the controlled substance offense alleged in Counts III of this Indictment, defendant shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to a 2003 BMW 745 Li, VIN #1HGCB7663LA00614

Upon conviction of the firearms offense alleged in Count V of this Indictment, defendant shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in the commission of the offense, including but not limited to the following:

- (a) a Glock model 19 9 mm semi-automatic, serial no. GYG84;
- (b) a Glock model 30 .45 caliber semi-automatic, serial no. 6FC795; and
- (c) a Taurus model PT 58 S .380 caliber semi-automatic, serial no. KHH0910V.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) (and 18 U.S.C. § 2461(c) with respect to Count V), to seek forfeiture of any other property of said defendant(s) up to the value of the forfeitable property described above.

A TRUE BILL:

Foreperson

COLM F. CONNOLY
United States Attorney

By: Douglas E. McCann
Douglas E. McCann
Assistant United States Attorney

Dated: August 1, 2006